



“Rural or Railroaded?”

Danelle O’Keeffe and Duane Butts

7 Orakei Road

Submission 72

Welcome and relax - Rural life outside at 7 Orakei Road

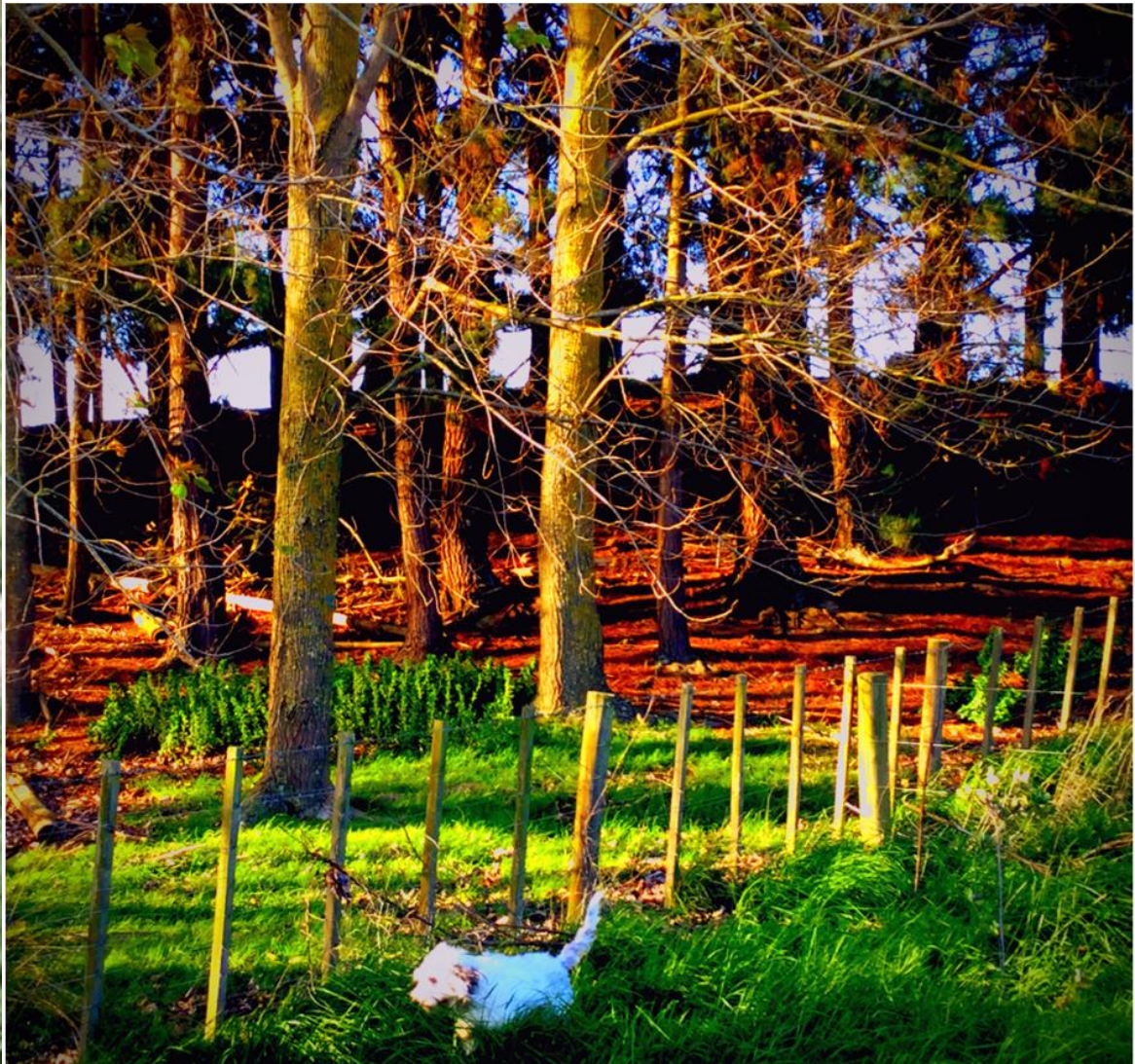


Peaceful gardens complete with the sounds of birds, including Tui's and the occasional wood pigeon!



Native bush reserve runs through the subdivision planted by local community drive a decade

ago



Sunsets on the deck or from the lounge.



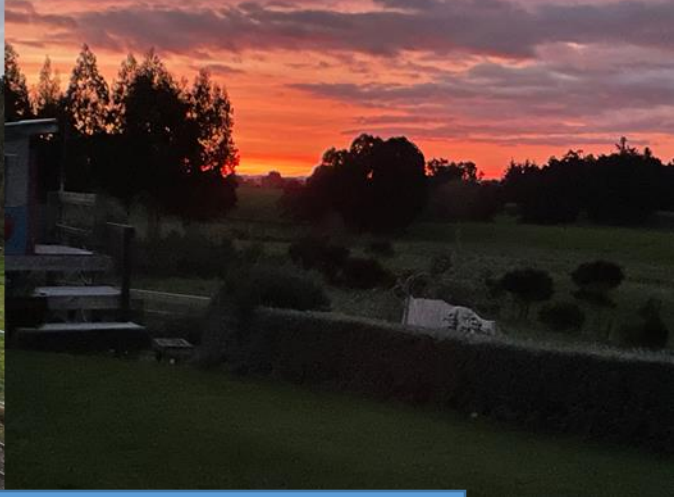
Rural kids who also spend more time outside than inside!



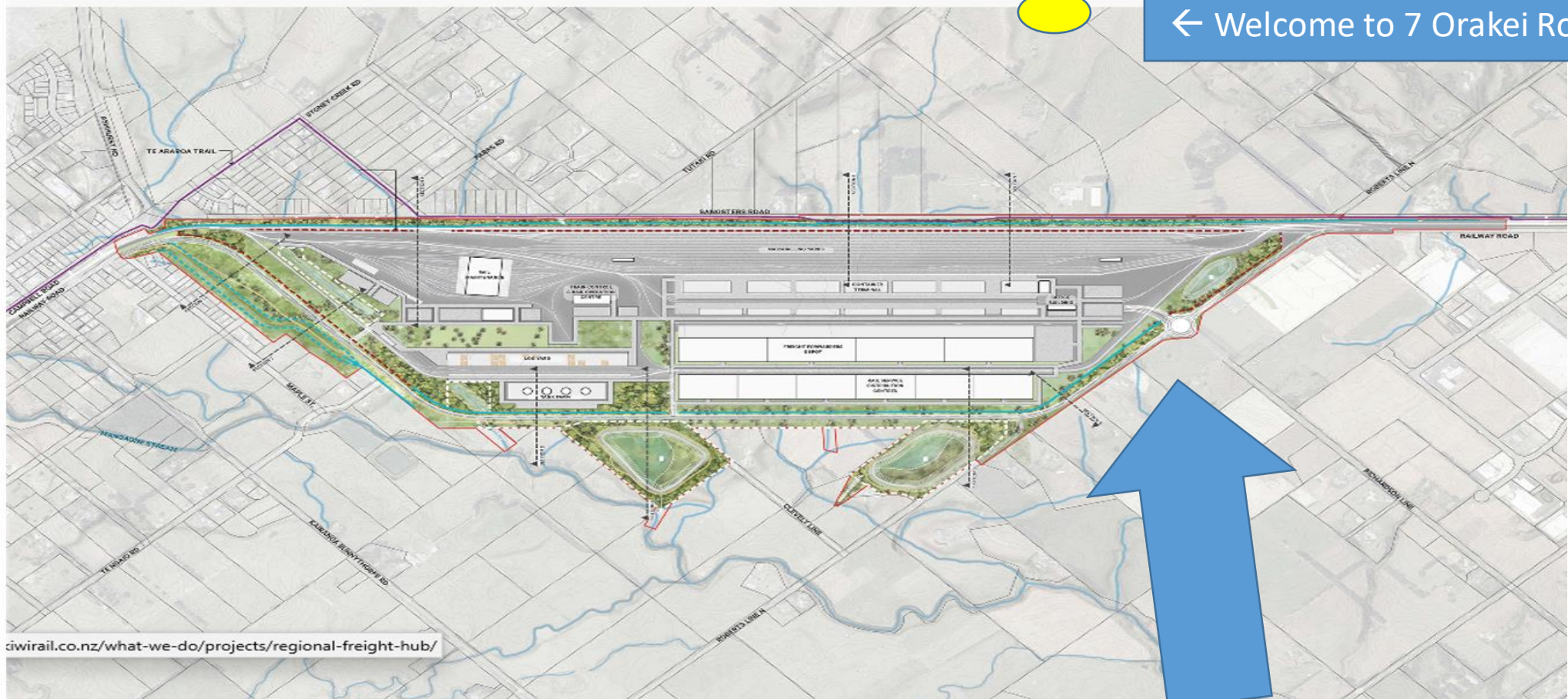


Submission 72: 7 Orakei Road – our story

- Built our dream home in 2015, paid a premium but loving the rural life!
- How did we get lucky enough to build there?
 - No lotto ticket or inheritance involved,just lots of scrimping and saving.
 - Fulltime working with NZDF for 20-30 years each with majority spent at Ohakea. Duane has worked for Airways for the last 8 years.
 - We have served, doing our best for our country and community.
- Should we have seen the Rail hub coming?
 - How?
 - No evident Public Plans available – indicating Kiwirail Site or industrial land.
 - No, the site was largely Rural Zoned.
 - Section buy: Green belt was being pushed around the city to welcome/attract visitors.
 - No sign of a rail hub, no sign of significant development in council plans, relatively small industrial area only.



← Welcome to 7 Orakei Road



Submission 72 covered key points:

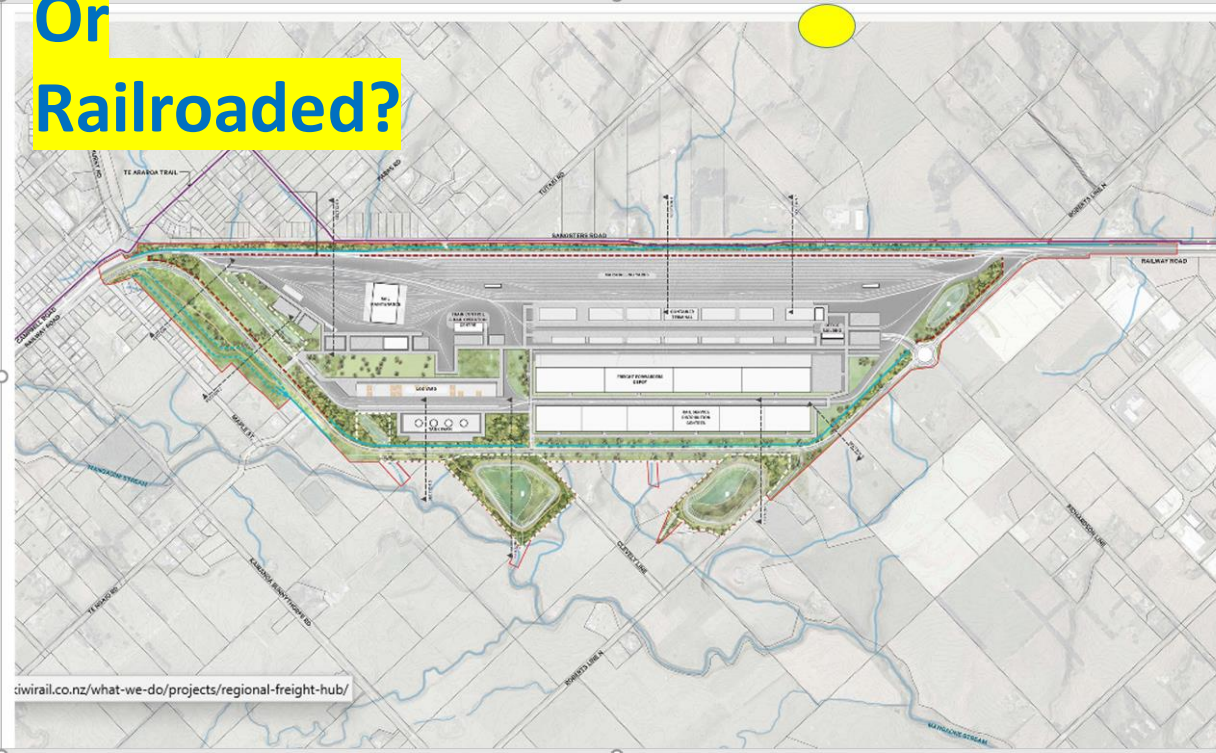
- Taken as read
- MCA Process and Report
- Planning, Strategy and Vision
- Design and construction
- Rail design
- Lighting Design
- Transport – impact of road changes
- Noise and acoustics
- Landscape and visual
- Storm water/Flooding
- Contaminated Land
- Social Impacts
- Economic impacts

We:

- Oppose the NOR in question.
- Acknowledge and support Dr Fox and Whittle legal challenge.
- Challenge legitimacy of MCA – appears predetermined.
- Question: Is the proposal really for the greater good?
- Request Panel actions and considerations around NOR



Rural ?
Or
Railroaded?





Summary:

Our Critical analysis

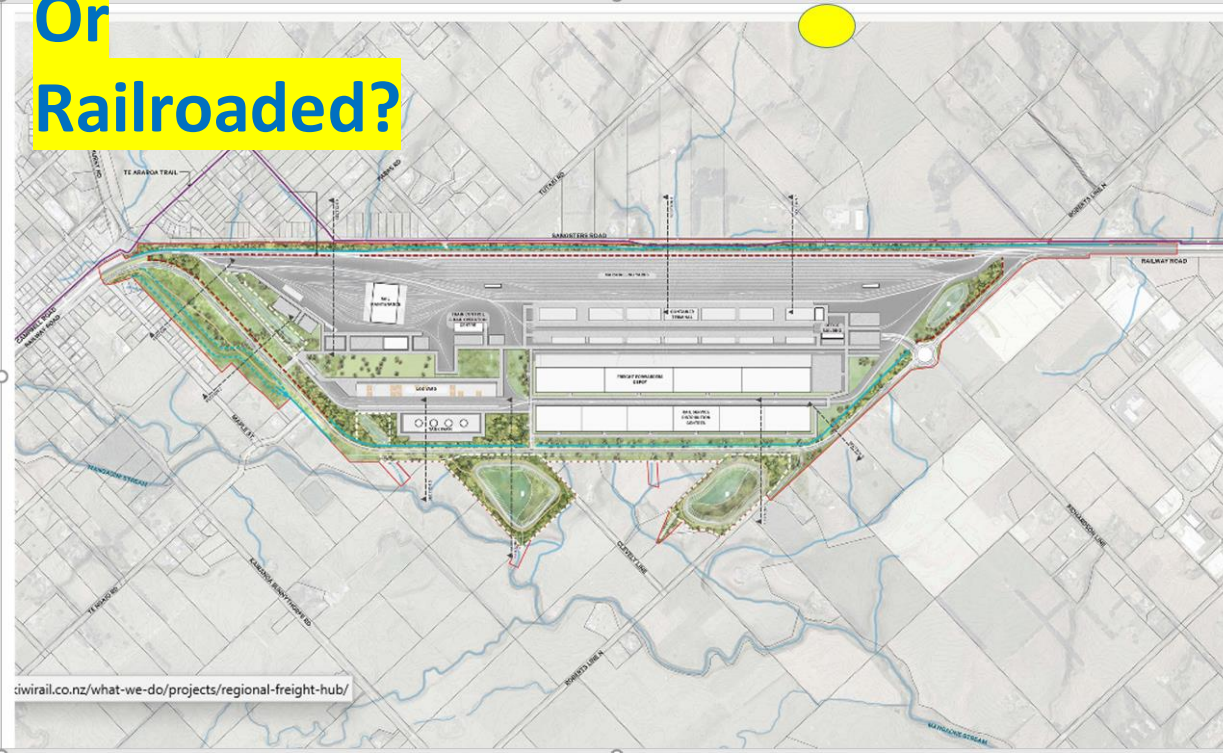
- Oppose the NOR in question.
 - Size, scope, location and anomalies with MCA site selection and planning/communication (public plans and notification).
 - Significant adverse impact on people and environment.
 - Acknowledge and support Dr Fox and Whittle legal challenge.
 - Challenge legitimacy of MCA – appears predetermined.
- Request a high number of panel actions and offer considerations (Adequate process and fair/reasonable outcome).

Our Emotive side: What happened with the Vision/Strategy/ Planning public communication over the last decade?

- **Why is the apparent lack of planning and communication of other organisations, now my families problem?**
- **Why should residents quietly accept an uphill legal battle if the NOR is accepted?**
- **Why should residents stay inside with doors and window closed (to avoid the introduced Noise/contaminates)?**



Rural ?
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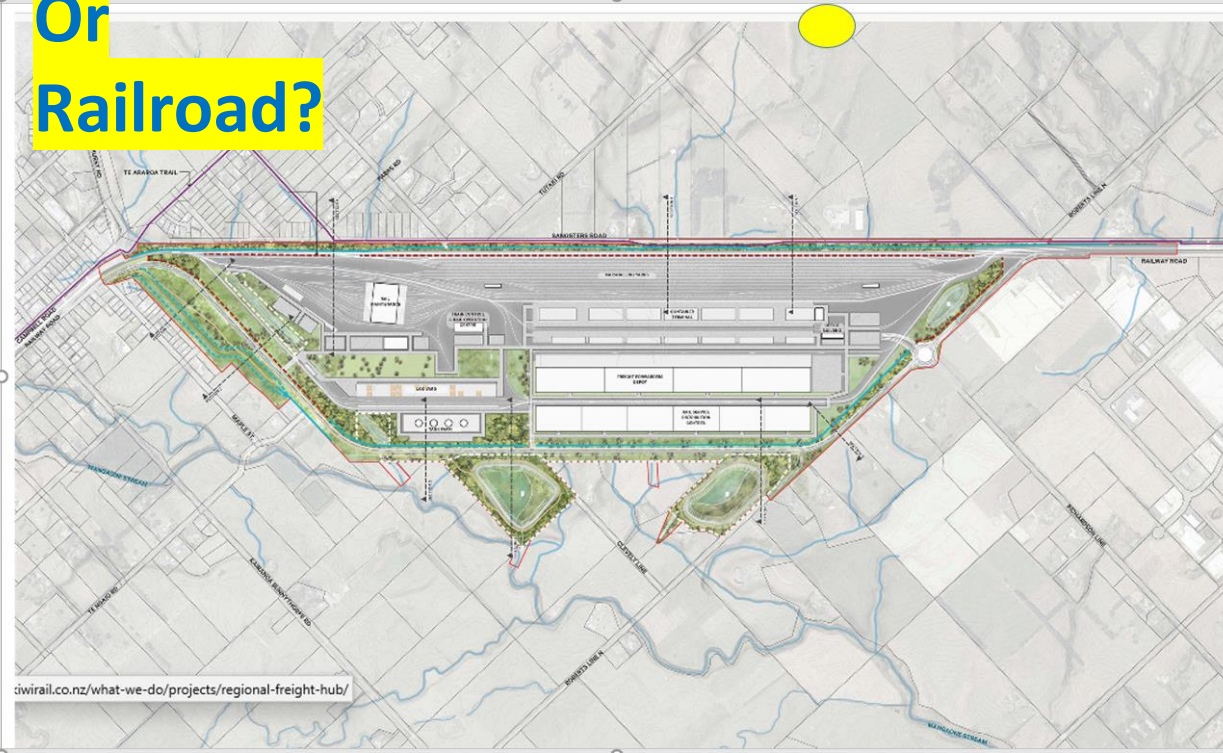


Our Key Points today:

- Vision, Strategy, Planning and Process:
 - Basic Planning and comms:
 - It's how big/old? Hard to see coming? Comms?
 - Pre-2019 plans: Why not a larger area zoned industrial?
 - Inside city limits in a largely rural zoned area – seriously?
 - MCA Objectivity and neutrality?
 - Sites 5&6 combined during assessments then declared flawed?
 - Large portions desktop analysis with controlled input sources?
 - Workshop 3 comments from Senior Planner preferred site
 - Predetermination of the site?
 - Timelines and documents:
 - Aug 2018 specific mention of NEIZ or 65 hectare site in Council to Govt docs and PCG docs?
 - Feb 2021 in public meeting GM advised site not determined?
 - Shortly afterwards in 2021 Site was announced, by coincidence same site as 2018 PCG and Council docs.....?



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Railroad?

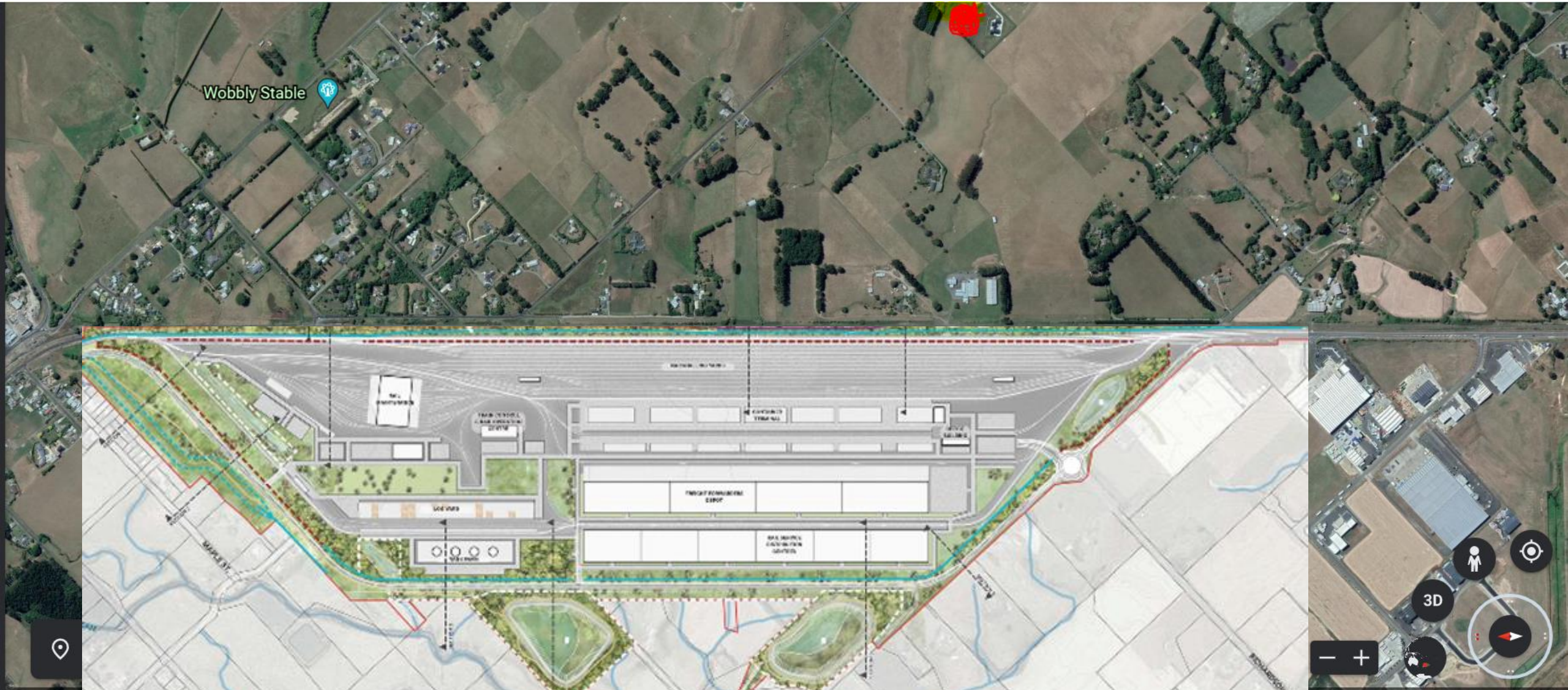


Our Key Points today:

- Vision: Why not a split sites option?
 - Why - one large site, impacts many not currently impacted?
 - Understood Kiwirail can ask for whatever they like, why not given smaller options?
 - Why not further out? etc
- Storm water, flooding – water protection
- Connectivity, road safety and climate change
- Transport Plan- Lacks cohesion – NZTA, Kiwirail, Council
- Economic
- Noise
- Social responsibility
- 24/7 hour operation?
 - Why should that be allowed here?
 - Why not constrain it, you would if it was an airport?
 - Why should Kiwirail be allowed to set rules here?

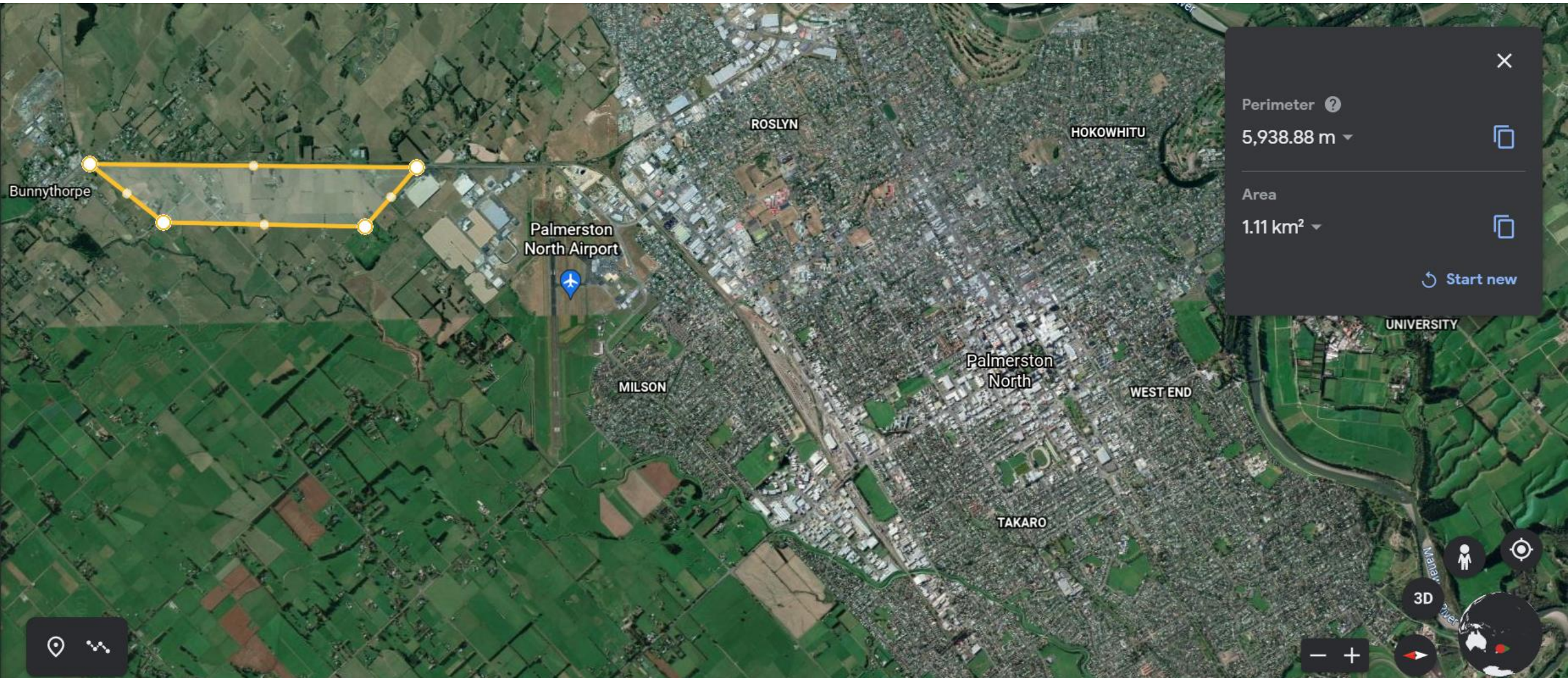
Vision, Strategy, Planning, Process:

First reaction: It's how big?



It's how big?

Let's zoom out! Ok, it's big but relative what in Palmy....



It's how big?

May be zoom in a bit! How about compared to the airport?



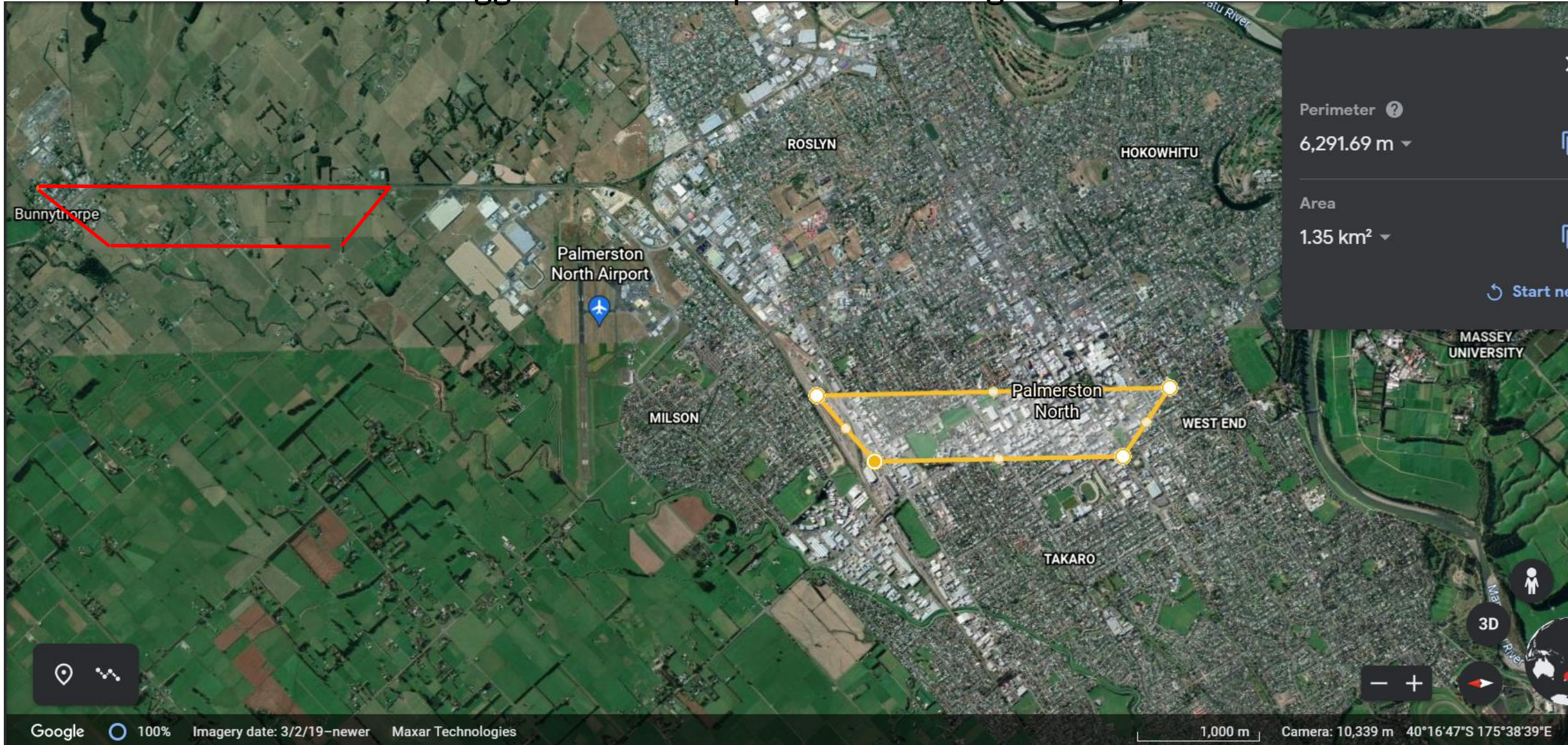
Ok, It's bigger than our airport?

...and its worth millions but nothing that big is in the plans?



It's bigger than Rangitikei Street?

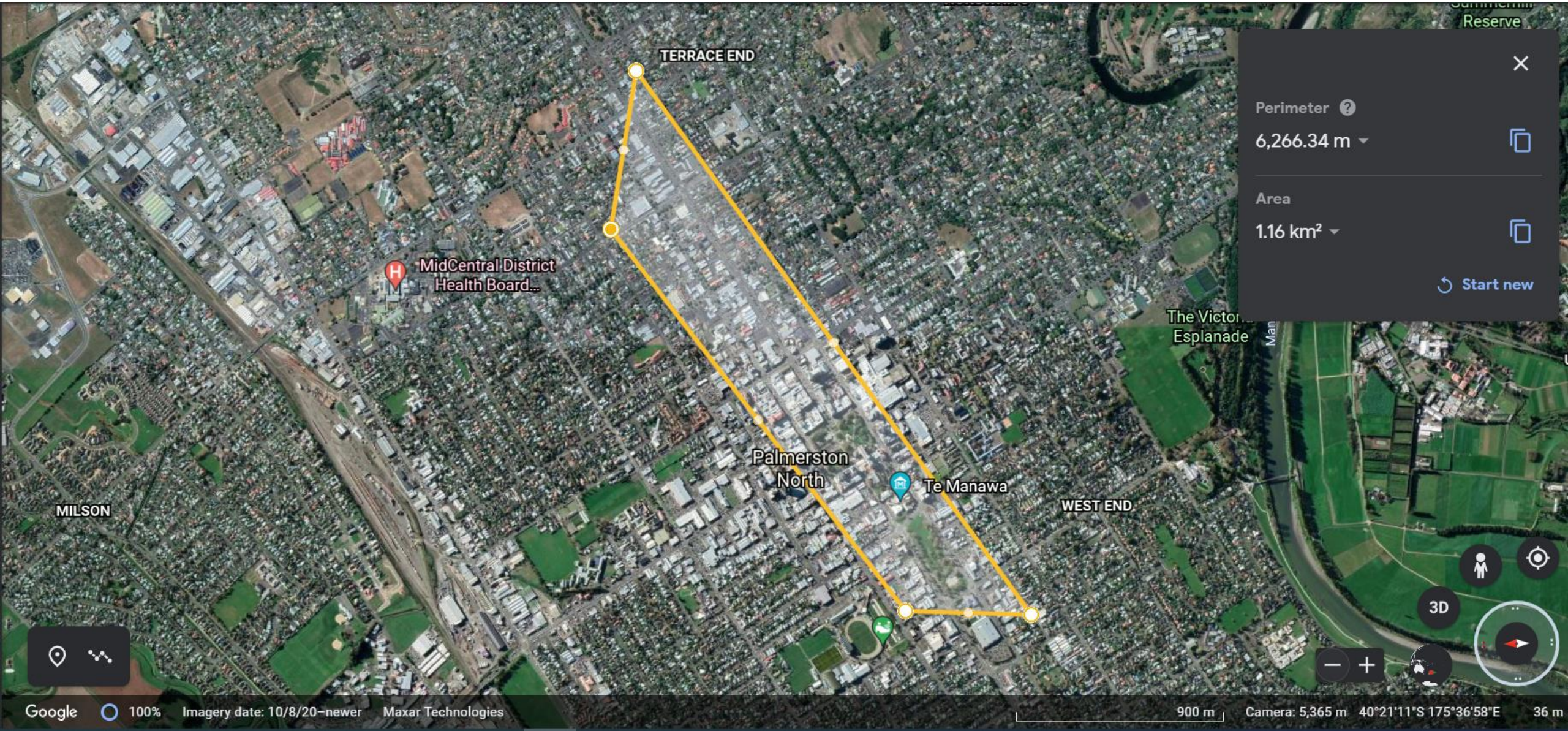
...and worth millions, bigger than an airport but nothing in the plans?



It's bigger than Broadway Street to the Warehouse ?



Yup, its big!



Planning, strategy and vision:

So its big:

.....bigger than the airport, bigger than Rangitikei Street, Broadway all the way across the Square to the Warehouse etc
.....its an asset worth millions and no one saw the change need coming (well enough to put it in a public plan

....seems big enough to see coming, to need a plan, to communicate potential plan well in advance?

How old? How long railyards historically last?

In Palmy:

-original railyards and existing railyards (1964) were replaced at ~50 year intervals?

-2018: another ~50 years down track from existing yards.....and nothing in public plans communicated.....

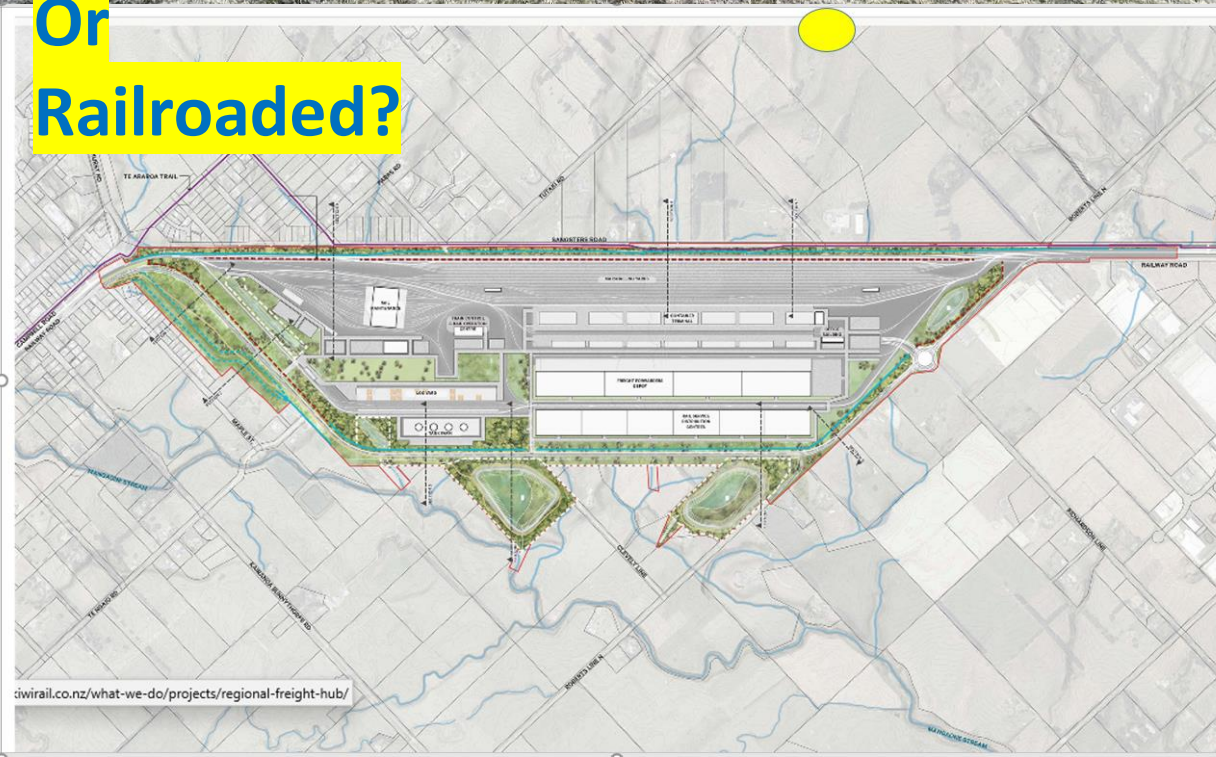
How much does one cost? lots!

Hmmm.... Asset Management, planning and scheduling. Its a big part of our jobs in aviation. In fact planning and scheduling assets are critical to operations and safety.....must be a big part of city infrastructure ...in yet not seen coming or at least not in public plans

What happened with Vision/Strategy/ Planning/Comms?.... **Why the apparent lack of it, now my families problem?!**



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Key Points today:

- ~~Take submission as read — ok, got it.~~
- Vision, Strategy, Planning and Process:
 - ~~Basic Planning and comms:~~
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Predetermination of sites?

- Timelines and documents:
 - ~July/Aug 2018: Specific mention in Council docs, Mayoral letter, Govt PCG docs (included NEIZ comment. Extract below)?
 - Early Feb 2021 in public meeting Kiwirail GM advised site not determined?
 - 26 Feb - shortly afterwards, 2021 NEIZ Site announced.

1. KiwiRail Palmerston North Regional Economic Growth Hub Project PGF Application

Background & context:

Applicant Organisation:

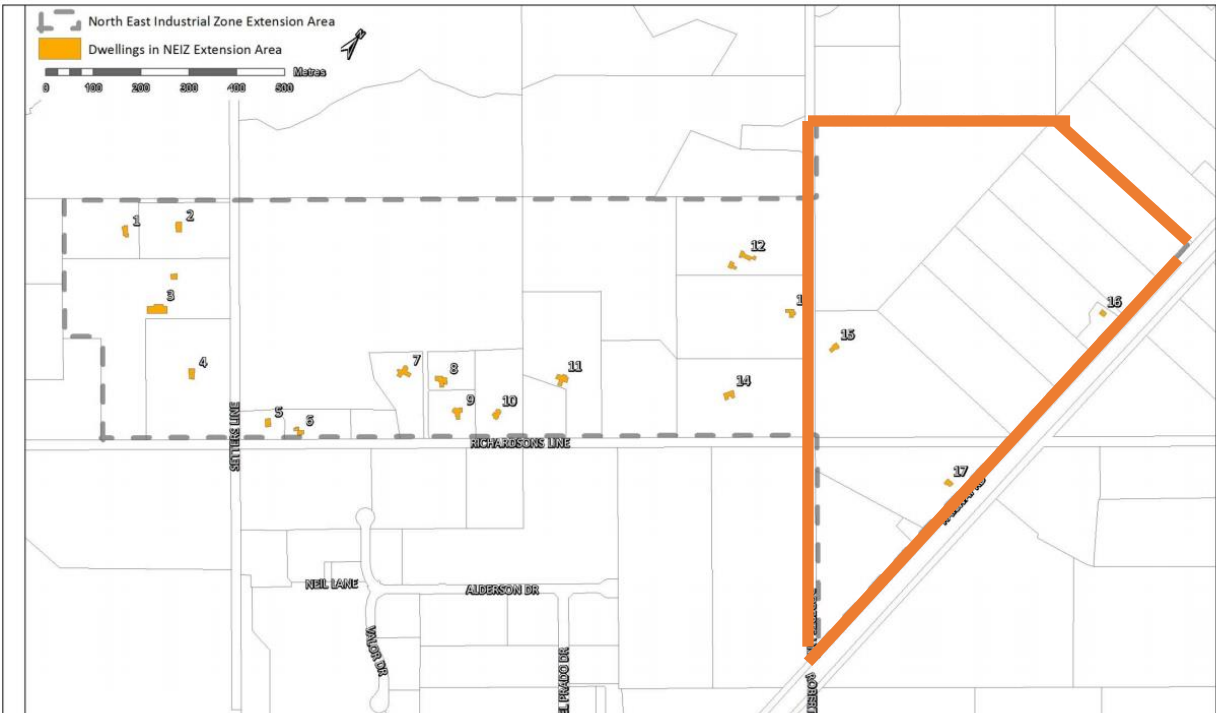
- KiwiRail

Location:

- Palmerston North

Proposal:

- The acquisition of approximately 65 hectares of land in the North East Industrial Zone (NEIZ), in Palmerston North, to better service Central New Zealand's growing freight



PROVINCIAL DEVELOPMENT UNIT
New Zealand Government

COVER SHEET

1. KiwiRail Palmerston North Regional Economic Growth Hub Project PGF Application	For: Approve
Background & context:	Recommendation:
Applicant Organisation: • KiwiRail	We recommend that the IAP:
Location: • Palmerston North	a) Note That the KiwiRail Palmerston North Regional Economic Growth Hub Project is part of a package that Cabinet is due to consider shortly.
Proposal: • The acquisition of approximately 65 hectares of land in the North East Industrial Zone (NEIZ), in Palmerston North, to better service Central New Zealand's growing freight demands and support the country's wider regional transport, economic development and supply chain strategies. • The key objective is to provide central New Zealand with a long term, dependable freight distribution solution.	b) Note Phase 1a involves the site identification, designation, master-planning and concept design. Phase 1b involves land acquisition. This would commence subject to Phase 1a meeting assessment requirements. c) Note The timeline for successful land acquisition is approximately 2-3 years. d) Note KiwiRail has undertaken an initial assessment of land options which meet future

<ul style="list-style-type: none"> • Lack of connectivity to new industrial areas, double handling, rail infrastructure restraints on train sizes, and an inability to meet some time critical requirements currently limit rail freight handling capabilities at the existing site. • Securing a site in the NEIZ to develop an upgraded, future-proofed Regional Economic Growth Hub, would best position KiwiRail and its freight partners to efficiently and sustainably deliver on New Zealand's growing freight demands for the next 50 - 100 years. • Centrally located in relation to the large North Island import ports; • In close proximity to the Wellington regional population; and • Well situated to handle the flow of import goods south through the North Island (from Auckland to Wellington). • The NEIZ has been developed as a key location for New Zealand's rail freight in central New Zealand taking freight from north, south, east and west, supporting planned roading infrastructure in the area and its proximity to airfreight and complementing overall regional transport initiatives. • In the Ministry of Transport's National Freight 	<ul style="list-style-type: none"> • Facilitate an integrated region-wide transport solution through key stakeholder collaboration; and • Support and enable Palmerston North's Strategic plans for the city. <p>f) Note the high level cost estimate for full development of the Regional Economic Growth Hub.</p> <p>g) Note The MoT supports the proposal stating that 'the aspirations are considered to be consistent with the Government's objectives for transport and freight, where the respective contributions of all modes are optimised as part of a mode-neutral approach. The facility represents the optimal and most appropriate use of KiwiRail's land assets in Palmerston North.</p> <p>Note NZTA has specifically identified the Manawati-Whanganui region and Palmerston North as being a key enabler for economic growth and a regional surge location for freight distribution in New Zealand.</p> <p>i) Note That NZTA advice is that from a National Land Transport Programme (NLT) perspective, the Palmerston North Regional Growth Hub is not in the NLT 18-21 and would not be eligible</p>
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OFFICE OF THE MAYOR
Palmerston North City Council

10 July 2018

Peter Reidy
Chief Executive
KiwiRail
PO Box 593
WELLINGTON 6140

Dear Peter

KiwiRail Regional Intermodal Hub Business Case | Mayoral Endorsement

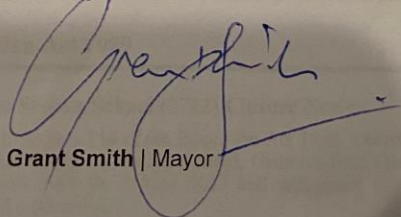
Thank you for making the time to meet with our team to discuss KiwiRail's Regional Intermodal Hub Business Case for Palmerston North. The purpose of this letter is to provide my Mayoral endorsement of the business case for this Regional Hub. My view is that this is an exciting economic opportunity for not only both the City and the Manawatu-Wanganui Region, but also Central New Zealand and our place in the NZ Inc logistics and distribution chain.

KiwiRail's proposal aligns well with the Council's vision, goals and strategic planning for the City. The proposal will give effect to large parts of our Strategic Transport Plan, City Development Strategy and Economic Development Strategy.

The City is well positioned to provide for the Intermodal Hub. We have greenfield industrial land zoned in the location you have identified and have capital programmes and funding in place to provide infrastructure to support this Intermodal Hub and the co-location of industrial development as well as roading infrastructure and airfreight in this location.

The Council looks forward to working with and supporting KiwiRail through the various processes required to bring this exciting opportunity to fruition.

Kind regards



Grant Smith | Mayor

Panel action:

Request the panel looks for a copy of the Kiwirail report to determine if NEIZ was the location in this report.

-Considers the PGF request, Mayoral Endorsement and Kiwrail report from 2018 regards predetermined site question.

- Compare to publicly released local Council plans that would indicate to locals/buyers that a site of between 65 hectare or 177 hectare was possible.

-Requests all information on consents issued in the area for building permissions and land.

MCA: Site selections 1 through 9

The combination of site assessment outcomes and amount of desk top analysis is questionable at best:

Examples:

- Sites 5 & 6 combined during assessments then declared flawed?
 - Workshop 3 – Senior Planner noted as pushing this site as the preferred site.
 - Large portions desktop analysis with controlled input sources?
 - Lumped options were explored. Why not an option to split sites?
 - Proximity to town questionable?
- One large site, why not one option with spread sites looking to lessen negative impacts?
 - Suggest about costs for Kiwirail and Council.
 - What about negative costs/impacts on immediate and nearby locals who had no input until recently?
 - Request panel: Decline NOR or require further independent investigation
 - Adequate assessment? Fair and reasonable?



Figure 3-1: The rail corridor from Longburn to Fielding Aerodrome

At the workshop David Murphy (from PNCC) outlined the infrastructure strategy from the PNCC 10-year plan (2018- 2028) to provide further context for the project.

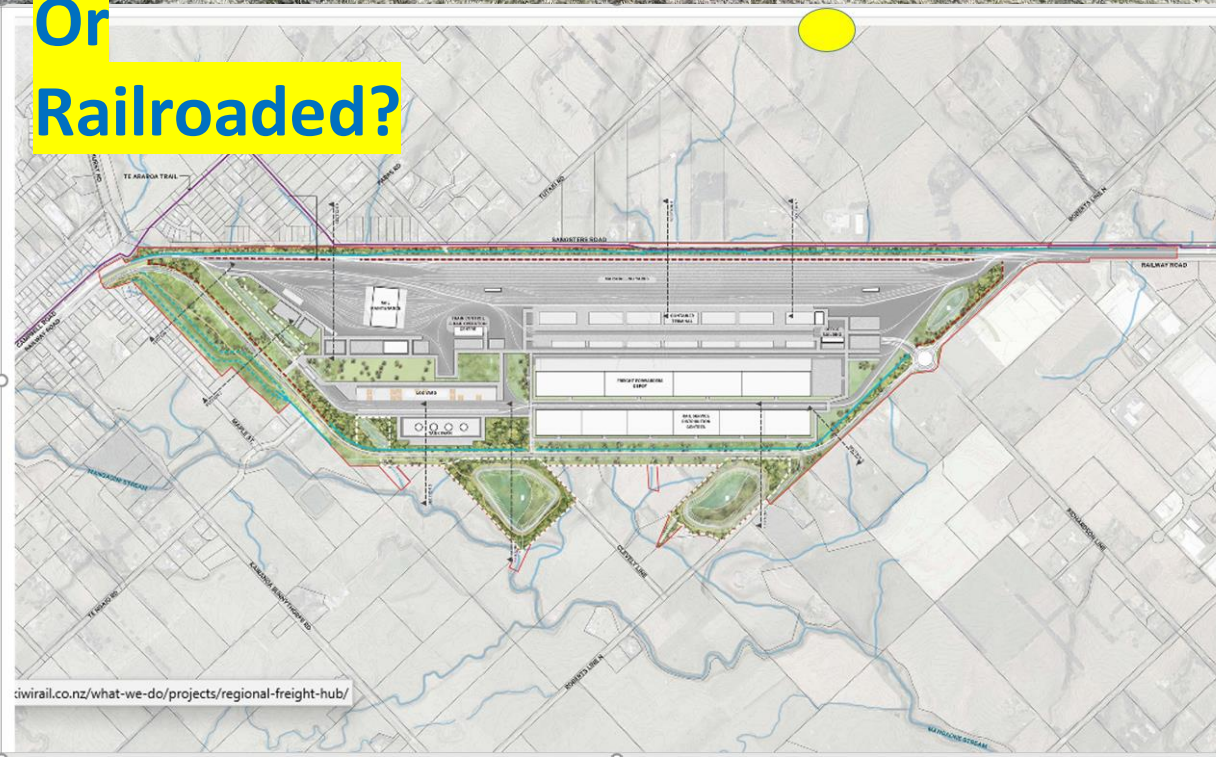
Paula Hunter outlined the MCA process and explained that the purpose of the tool is to aide KiwiRail's decision making by comparing and assessing options. She also explained the principles that were applied in developing the assessment criteria and introduced the proposed assessment criteria.

3.4.3.12 Community cohesion
The following table sets out the community cohesion assessment and scoring for each of the site options.
Table 3-33: Community cohesion assessment and scoring

Site Option	Score	Assessment
Option 1a	4	<ul style="list-style-type: none">• Taonui School contained within the site. Severance for community. Longer travelling distances and times. Implications for other schools in the area.• MDC Utility Asset – potential to be relocated.• Mainly rural.• Opposite Feilding Aerodrome – potential height restrictions
Option 1b	3	<ul style="list-style-type: none">• Close to Taonui School. Implications for the designation and drop of school roll.• MDC Utility Asset – potential to be relocated.• Mainly rural.
Option 2a	4	<ul style="list-style-type: none">• Feilding aerodrome and associated activities and facilities, contained within the site. Provides training and employment and is the base for a range of aviation sport related activities. Not easily relocated. Severance.• MDC Utility Asset – potential to be relocated.• Mainly rural.• Some businesses that could be easily relocated.
Option 2b	2	<ul style="list-style-type: none">• Close to Feilding Aerodrome – possible height restrictions.• MDC Utility Asset – potential to be relocated.• Rural• Some businesses that could be easily relocated.
		<ul style="list-style-type: none">• PCC Water Bore southern end of site – assume impacts on this resource will be avoided.• Rural



Rural ?
Or
Railroaded?



Key Points today:

- ~~Take submission as read — ok, got it.~~
- Vision, Strategy, Planning and process:
 - ~~Hard to see coming?~~
 - ~~Predetermination of the site?~~
 - ~~Timelines and documents:~~
 - ~~Aug 2018 Specific mention in Council to Govt PCG docs?~~
 - ~~Community consults Sep/Oct 20 NOR received~~
 - ~~Early Feb 2021 Kiwirail GM in public meeting told site not determined?~~
 - ~~26 Feb site publically notified~~
 - ~~Objectivity and neutrality of the MCA?~~
 - ~~Sites combined during assessments then declared flawed?~~
 - ~~Large portions desktop analysis with controlled input sources?~~
 - ~~Workshop 3 comments from Senior Planner preferred site (NEIZ)~~

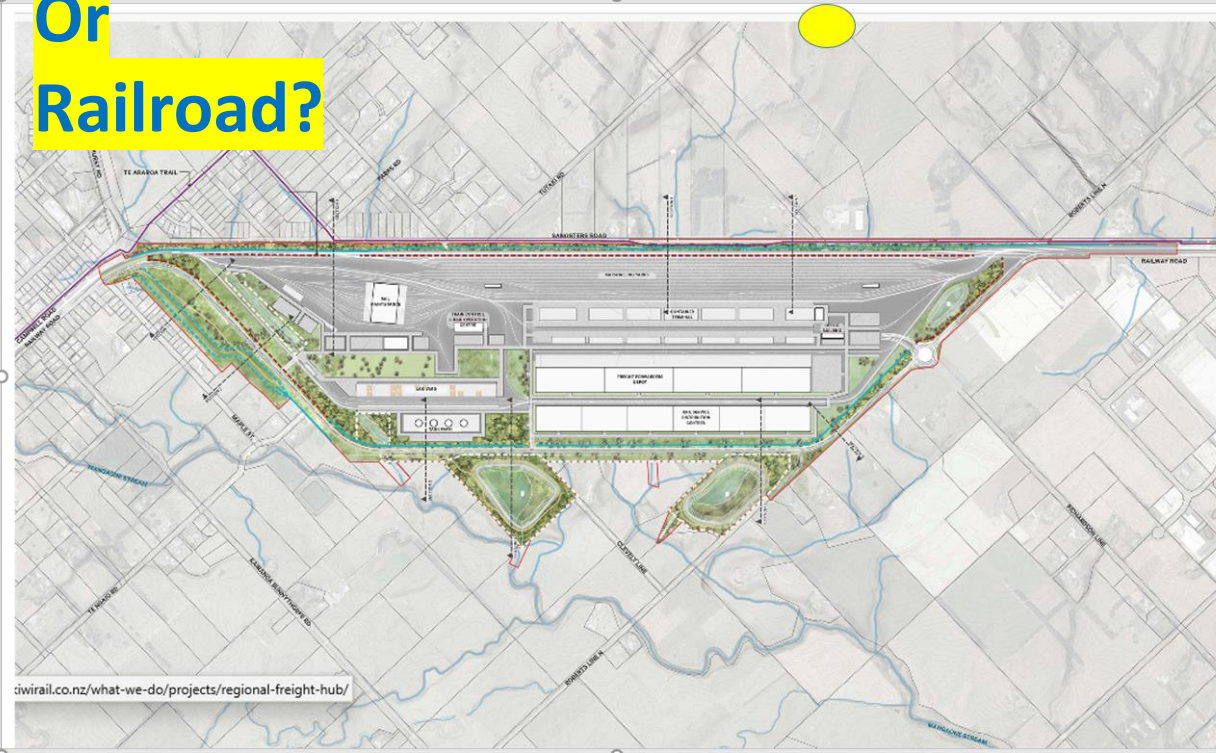
Key point page 2:



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At the workshop David Murphy (from PHCC) outlined the infrastructure strategy from the PHCC 10-year plan (2018-2028) to provide further context for the project.
Paula Hunter outlined the MCA process and explained that the purpose of the tool is to aide Kiwirail's decision making by comparing and assessing options. She also explained the principles that were applied in developing the assessment criteria and introduced the proposed assessment criteria.



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Railroad?



- Planning
- Storm water, flooding – water protection
- Connectivity, road safety and climate change
- Road safety: Lack of coherent transport plan – NZTA, Kiwirail, council
- Noise
- Economic
- Social responsibility
- Freight Hub 24/7 hour operation?
 - Why should that be allowed here?
 - Why not constrain it,if it was an airport?
 - Why should Kiwirail be allowed to set rules here?
 - Why should locals be setup for an uphill battle later?

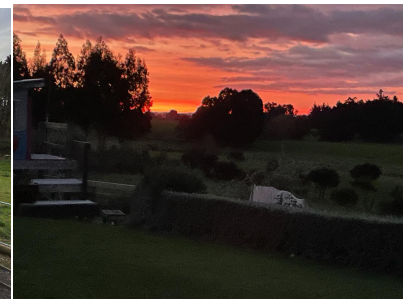
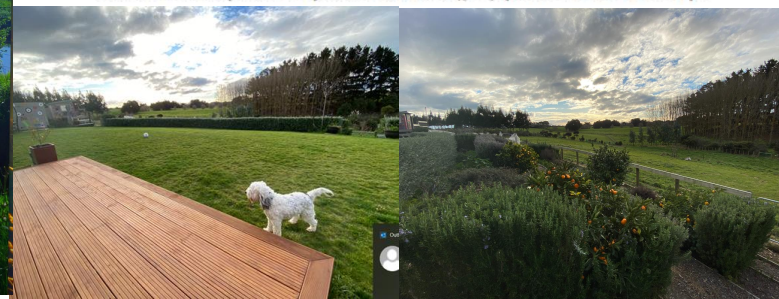
Noise:

Kiwirail noise expert confirmed:

- Noise wall ineffective at distance to our house (blue area).
- Model does not include wind effect.

- Equivalent of someone having a loud conversation outside your window.

What if your Rural life style means you live and relax outside?



208. The noise modelling contours in Figure 8⁴⁵ shows the extent of the 45 dB $L_{Aeq(1h)}$ contour for a *busy hour*. If the *busy hour* was to occur at night, then the outer edge of the contours indicates the extent of the night-time noise impact.⁴⁶

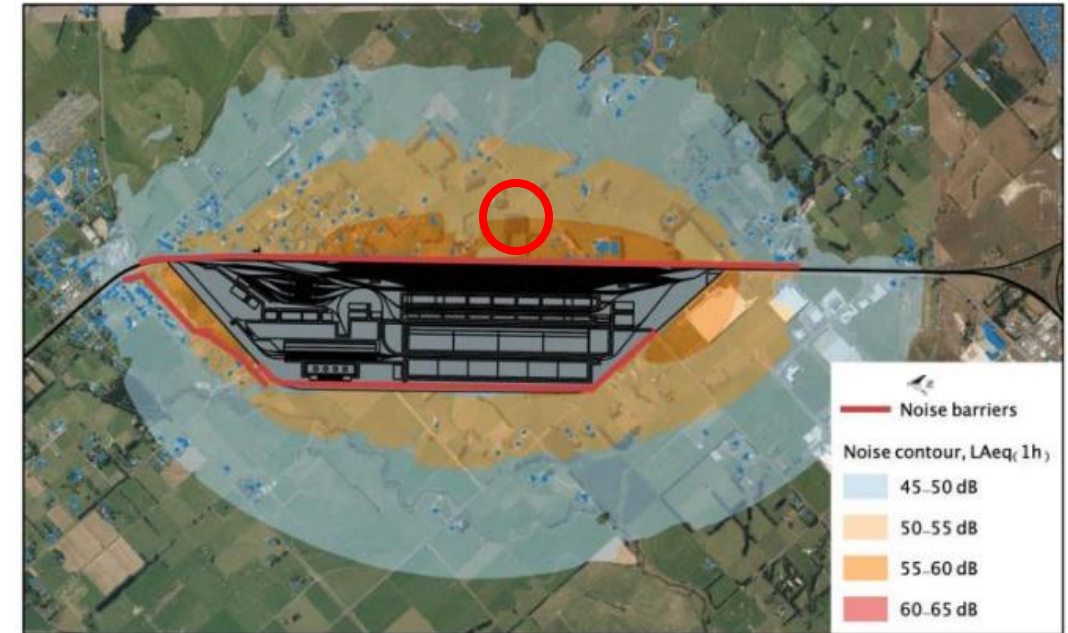


Figure 8. Indicative noise contours with noise barriers (Acoustic Assessment Fig 12)

⁴⁵ Figure 12 of the Acoustic Assessment.

⁴⁶ 45 dB $L_{Aeq(1hr)}$ represents the Freight Hub night-time noise criteria (Category A and B) below which noise insulation would not be required. The District Plan night-time noise limit for the Rural Zone (R9.11.1) is 40 dB $L_{Aeq(1hr)}$ (and 70 dB L_{Amax}).



Summary:

- Oppose the NOR in question.
 - Size, scope, location and anomalies with MCA site selection and planning/communication (public plans and notification).
 - Significant adverse impact on people and environment.
 - Question the forecasts in KR proposal
 - Challenge legitimacy of MCA – appears predetermined.
 - Acknowledge and support Dr Fox and Whittle legal challenge.
- Request a high number of panel actions and offer considerations (Adequate process and fair/reasonable outcome).

Question: What happened with Vision/Strategy/ Planning?

- **Why is the apparent lack of planning and communication of other organisations, now my families problem?**
- **Why should residents quietly accept an uphill legal battle if the NOR is accepted?**
- **Why should residents stay inside with doors and window closed (to avoid the introduced Noise/contaminates)?**

Panel actions requested:

- Refer submission for details.
- On behalf on directly impacted and nearby residents, request and analyse documents for indications of site predetermination and ask yourself is it adequate/fair/reasonable:
 - That the site was not predetermined?
 - this site should have been chosen, was the planning and process adequate, fair and reasonable.
 - this site have operational constraints and further mitigations/analysis placed on it to protect locals.
 - Why should Kiwirail be able to take control of this site in future with potentially further degradation/negative impact on locals
 - Should notification via public sources have been readily available to locals earlier for awareness.
- Specifically, request copies of the Kiwirail report to determine if NEIZ was the location in this report. Considers the PGF request, Mayoral Endorsement and Kiwrail report from 2018 regards predetermined site question.
- Compare to publicly released local Council plans that would indicate to locals/buyers that a site of between 65 hectare or 177 hectare was possible.
- Requests all information on consents issued in the area for building permissions and land.

Panel actions requested:

- Decline NOR or conduct a comprehensive independent review of MCA process in particular weightings and combinations of other sites. Also why a split site option could not have been submitted.
- Does not accept NOR until risks to water table, bore and potential contamination are comprehensively assessed and understood.
- Requires additional Noise mitigations for sites further from the noise walls in advance of accepting NOR. Also strongly consider imposing significant operational constraints on Kiwirail at night/weekends or chose a site further from town impacting significantly less homes.
- Requires Noise modelling to be conducted to account for the prevailing winds.
- Does not accept site designation to occur until roading plan is finalised and assessed.
- Strongly considers road safety with potential road changes and closures suggested so far.
- considers and questions realistic economic benefits and forecasts with this proposal – example jobs and benefits seem particularly overstated.

Request the Panel consider the following, and/or require the following actions prior to decision on designation or NOR;

- Mandate that 'resilient' track forms are to be used in the hub footprint (NOR 9.4.3) that is construction/design of all tracks to include noise/vibration buffer/dampers are to be installed for all tracks within the hub, including any new or realigned tracks as a result of the construction of the hub. All new carriages/engines to be fitted with dampening couplers, and all carriage engines to be retro fitted with the same following refurbishment or servicing activities. All Engines/vehicles to be used for shunting, carriage movement within the Hub to be fitted with the same.
- Effects of prevailing winds on acoustics requires assessment, as this was not factored in at the time of assessment. Applicable areas such as Bunnythorpe environs, Te Ngaio Road, Clevely Line, Parrs road, Stoney Creek road, Tutaki road, Orakei Road, Roberts line to Kelvin Grove Road (due to proximity of residential properties). This work may highlight a high number of houses that will be impacted and may require modifying, which would be required in advance of any land designation.
- All recommendations as per Appendix A of PNCC s 42A Tech Report Report: Noise be mandated at a minimum, including the penalties associated with 'special audible characteristics' requiring a +5dB penalty be added to all modelling estimates.
- Any exceedances to be addressed and remedied as soon as practicable.

- Soundproofing mitigation for residents to achieve limits as stated above, if this cannot be achieved the option to formally request KR purchase these properties should be available.
- All noise insulation mitigation, and dwelling/business etc soundproofing, including ventilation options to be carried out prior to any construction commencing at nil cost to the resident.
- Ongoing noise/vibration complaints to be responded to within 20 days and actioned within 60 days, all complaints to be reviewed (at minimum) 6 months periods with findings and follow-up actions to be advised to the complainant within that period. PNCC/Horizons to be advised of all complaints/actions for on-going monitoring and assessment. Mitigation measures to be actioned as soon as practicable.
- The proposed Liaison position to be retained in perpetuity of construction and operations to ensure compliance and actions.
- If rail yard hours of operation are confirmed as being required 24/7, should this site be approved, then significant noise limitations should be imposed between certain hours and for certain periods. Similar in approach to mitigation as per the airport, limit high noise 'creating' activities to the hours of daylight, loading, unloading logs, container movement to daylight hours – refer to PNCC recommendations.
- Mandate noise reduction activities such as: electric vehicles to be used for all movements in the yard including cargo, freight loading unloading and container movement (this should be within KR scope of climate change responsibility and will also be in keeping with PNCC goal to reduce its carbon footprint). All diesel engine operation on site to be kept at a minimum (inwards and outwards bound freight only), both to reduce noise and emissions. International studies should also be referred to for mitigation measures.

- Ongoing noise and vibration monitoring and actions to be in place, and remedial actions/or constraints applied when certain levels are consistently breached, in particular if attributable to certain activities e.g. container, log movement, shunting and/or vehicle movements, maintenance activities out of mandated limits.
- Independent investigation to be carried out into **health issues related to noise and vibration**, such as loss of sleep, fatigue, anxiety (depression), behavioural and learning issues, to enable a better understanding of the effects of the hub location on the community. Results to be submitted to this Panel, MOH, PNCC and made publically available prior to designation decision. Results to be considered with respect to the suitability of this site for a rail hub, in conjunction with mitigation requirements. This should include research into meaningful mitigation, with proposals suggested above such as noise restrictions, retrofitting double/triple glazing, sound proofing/insulation of homes, support for medical/health, behavioural or learning issues associated with the hub.
- KR are not to have the power/authority to change or amend noise/vibration limits at any time. Notification of and justification of any requirement to exceed stated noise/vibration limits – to be used as an exception, not as a rule.



Question?
“Rural
or Railroaded”



Granted in Rural lifestyle, you get use to cleaning up life's small messes,

Especially if you leave the door to the fort open aye boy!!!

